

The Hon. Sylvia O. Hinds-Radix  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

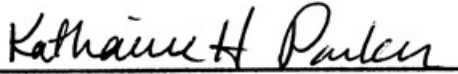
MARTHA NIMMER  
Special Assistant Corporation Counsel  
Cell: (917) 499-8632

June 3, 2022

**VIA ECF**

Hon. Lorna G. Schofield  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**APPLICATION GRANTED**

  
**Hon. Katharine H. Parker, U.S.M.J.** 6/7/2022

Re: *M.D. v. N.Y.C. Dep't of Education*, 21-cv-9180 (LGS)(KHP)

Dear Judge Schofield:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiffs seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write in regard to Your Honor's March 14, 2022 Order (ECF No. 11), wherein you instructed the parties to submit to Chambers a text-searchable copy of the Bates-stamped Record and a Word version of the Joint Statement. I have contacted Plaintiff's counsel to ascertain if he intends to provide this, but have not yet received a response.

Defendant respectfully requests that the deadline for filing these materials be extended from today to June 7, 2022. Defendant apologizes to the Court for the last minute nature of this request and any inconvenience it may cause.

Accordingly, Defendant respectfully requests that the deadline for submitting a text-searchable copy of the Bates-stamped Record and a Word version of the Joint Statement be extended to June 7, 2022.

Thank you for considering this request.

Respectfully submitted,

/s/

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Martha Nimmer  
Special Assistant Corporation Counsel

cc: Justin Coretti, Esq. (via ECF)